

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>In Re:</b>	)	<b>Case No:</b>	<b>20-06007</b>
<b>Reonta Reed</b>	)		
	)	<b>Chapter:</b>	<b>Chapter 7</b>
<b>Debtor</b>	)		
	)	<b>Judge:</b>	<b>Timothy A. Barnes</b>

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on **January 4, 2021 at 1:00 p.m.**, I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, and present the **MOTION TO REOPEN BANKRUPTCY TO FILE CERTIFICATION OF COMPLETION OF FINANCIAL MANAGEMENT COURSE AND FOR ENTRY OF A DISCHARGE**, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 161 329 5276 and the password is 433658. The meeting ID and password can also be found on the judge's page on the court's website.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

**By:** /s/ Scott Greenwood  
Scott Greenwood  
Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
312.332.1800  
ndil@geracilaw.com

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>In Re:</b>	)	<b>Case No:</b>	<b>20-06007</b>
<b>Reonta Reed</b>	)		
	)	<b>Chapter:</b>	<b>Chapter 7</b>
<b>Debtor</b>	)		
	)	<b>Judge:</b>	<b>Timothy A. Barnes</b>

**CERTIFICATE OF SERVICE**

The undersigned, Scott Greenwood, an Attorney, does hereby certify that I caused a copy of this notice and attached motion to be mailed to the above persons, at their respective addresses, first-class postage prepaid, by depositing the same in the U.S. Mail at 55 E. Monroe St., Chicago, Illinois, 60603, before 5:30 p.m. on December 8, 2020.

**LIST OF PARTIES SERVED**

R. Scott Alsterda, Nixon Peabody LLP Three First Natl Plaza #3500, Chicago, IL 60602-4283

Office of the U.S. Trustee, 219 S. Dearborn, Suite 873, Chicago, Illinois 60604

Reonta Ann Reed, 7302 S. Yates Blvd. #2, Chicago, IL 60649

ALL CREDITORS ON THE ATTACHED LIST

Reonta Ann Reed  
7302 S Yates Blvd #2  
Chicago, IL 60649

Capital One  
Attn: Bankruptcy Dept.  
26525 N Riverwoods Blvd  
Mettawa IL 60045

Capital ONE AUTO Finan  
Attn: Bankruptcy Dept.  
Po Box 259407  
Plano TX 75025

Capital ONE BANK USA N.A.  
C/O Portfolio Recov Assoc  
150 Corporate Blvd  
Norfolk VA 23502

CBNA  
Attn: Bankruptcy Dept.  
50 Northwest Point Road  
Elk Grove Village IL 60007

City of Chicago - Dept of Revenue  
Bankruptcy Department  
121 N. LaSalle St  
Room 107  
Chicago IL 60602

Comcast  
C/O Convergent Outsourcing  
800 Sw 39Th St  
Renton WA 98057

Comenity BANK  
C/O Portfolio Recov Assoc  
150 Corporate Blvd  
Norfolk VA 23502

Comenitybank/Ny&Co  
Attn: Bankruptcy Dept.  
Po Box 182789  
Columbus OH 43218

Comenitybank/Victoria  
Attn: Bankruptcy Dept.  
Po Box 182789  
Columbus OH 43218

Credit ONE BANK N.A.  
C/O Midland Funding  
320 E Big Beaver Rd Ste  
Troy MI 48083

Credit ONE BANK NA  
Attn: Bankruptcy Dept.  
Po Box 98875  
Las Vegas NV 89193

Illinois Department of Revenue  
Bankruptcy Department  
PO Box 19035  
Springfield IL 62794

Illinois Lending  
Bankruptcy Dept.  
3455 S Ashland Avenue  
Chicago IL 60608

Midland Funding, LLC  
Bankruptcy Department  
8875 Aero Drive, # 200  
San Diego CA 92123

Clerk, First Mun Div  
18M1124180  
50 W. Washington St., Rm. 1001  
Chicago IL 60602

Blitt and Gaines, PC  
18M1124180  
661 Glenn Ave.  
Wheeling IL 60090

Navient  
Attn: Bankruptcy Dept.  
123 S Justison St  
Wilmington DE 19801

OPP Loans  
Attn: Bankruptcy Dept.  
130 E Randolph St Ste 34  
Chicago IL 60601

Portfolio Recovery Assoc.  
Riverside Commerce Center  
120 Corporate Blvd., Ste. 100  
Norfolk VA 23502

Clerk, First Mun Div  
19M1124556  
50 W. Washington St., Rm. 1001  
Chicago IL 60602

Blitt and Gaines, PC  
19M1124556  
661 Glenn Ave.  
Wheeling IL 60090

Synchrony BANK  
C/O Portfolio Recov Assoc  
150 Corporate Blvd  
Norfolk VA 23502

Synchrony BANK  
C/O Midland Funding  
320 E Big Beaver Rd Ste  
Troy MI 48083

World Financial Network BANK  
C/O Portfolio Recov Assoc  
150 Corporate Blvd  
Norfolk VA 23502

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>In Re:</b>  <b>Reonta Reed</b> <b>Debtor,</b>	) ) ) ) )	<b>Case No: 20-06007</b>  <b>Chapter: Chapter 7</b>  <b>Judge: Timothy A. Barnes</b>
---	-----------------------	--

**MOTION TO REOPEN BANKRUPTCY TO FILE CERTIFICATION OF COMPLETION OF  
FINANCIAL MANAGEMENT COURSE AND FOR ENTRY OF A DISCHARGE**

The Debtor, Ms. Reonta Reed (the “Debtor”), by and through her attorneys, Geraci Law LLC, hereby submits this Motion to reopen her case in order to file a certification of completion of an instructional course concerning personal financial management and for entry of a discharge, and in support, alleges as follows:

1. The Debtor filed a Chapter 7 Voluntary Petition on 03/03/2020.
2. The Debtor appeared and testified at the scheduled Section 341 Meeting of Creditors on 04/30/2020 and a no asset report was filed by the Chapter 7 Trustee on the same date.
3. The Debtor’s Chapter 7 case was closed without entry of a discharge 07/06/2020 for failure to file a certification of completion of an instructional course concerning personal financial management (hereinafter “Form 23”) pursuant to 11 U.S.C. Sections 111 and 727, and Rule 1007(b)(7) of the Interim Rules of Bankruptcy Procedure.
4. On 07/07/2020, the Debtor completed an instructional course concerning personal financial management through an approved provider in accordance with 11 U.S.C Sec. 111 and on 07/08/2020 the certificate was filed by the course provider.
5. The Debtor has complied with all other requirements of the Bankruptcy Code and BAPCA.

WHEREFORE, the Debtor respectfully requests that the Court grant their Motion to Reopen their case in order to file Form 23, and for the entry of a discharge pursuant to 11 U.S.C. Sec. 727, and for any other and further relief that the Court deems just and equitable.

Respectfully submitted,

/s/Scott Greenwood  
Scott Greenwood

**Attorneys for the Debtor**

Geraci Law LLC  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
(Ph): 312.332.1800